

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ILANA KOPMAR, DIANE T. CLARKE,
And ISAAC ALTMAN,

Plaintiffs,

v.

ASSOCIATION OF LEGAL AID ATTORNEYS,
AMALGAMATED LOCAL UNION 2325 OF THE
INTERNATIONAL UNION, UNITED AUTOMOBILE
AEROSPACE AND AGRICULTURAL IMPLEMENT
WORKERS OF AMERICA (UAW), AFL-CIO and
DANIELLE WELCH, GERALD KOCH, EVA
STEVENSON, CANDACE GRAFF, LISA OHTA, BRETT
J. TAYLOR, EMILY C. EATON, MARTYNA
KAZNOWSKI, JEREMY BUNYANER, IOANA CALIN,
GILLIAN R. KRESS, PUJA PAUL, JACQUELINE
AGUILAR, BABATUNDE AREMU, CASE
BOHANNON, MICHAEL GIBBONS, ALEXANDER
HU, KELSEY LAING, MARTHA MENENDEZ,
HALLIE MITNIK, SEAN T. PARMENTER, IAN
SPIRIDIGLIOZZI, DOROTHY SUMMERS, TANNER
WEILAND, TORI ROSEMAN, ANDREW SPENCE,
COLLEEN FOLEY, and JULIA JENKINS,

Defendants.

**JOINT STIPULATION AND [PROPOSED] ORDER
EXTENDING TIME TO RESPOND TO COMPLAINT**

WHEREAS, Plaintiffs Ilana Kopmar, Diane T. Clarke, and Isaac Altman filed a complaint in the above-captioned action on July 8, 2024 (the “Complaint”);

WHEREAS, Plaintiffs effectuated service of the summons and Complaint upon Defendant Association of Legal Aid Attorneys, UAW Local 2325 and individual Defendants Danielle Welch, Gerald Koch, Eva Stevenson, Candace Graff, Lisa Ohta, Brett J. Taylor, Emily C. Eaton, Martyna Kaznowski, Jeremy Bunyaner, Ioana Calin, Gillian R. Kress, Puja Paul, Jacqueline Aguilar, Babatunde Aremu, Case Bohannon, Michael Gibbons, Alexander Hu, Kelsey Laing, Martha Menendez, Hallie Mitnik, Sean T. Parmenter, Ian Spiridiglizzi, Dorothy Summers, Tanner Weiland, Tori Roseman, Andrew Spence, Colleen Foley, and Julia Jenkins;

Hu, Kelsey Laing, Martha Menendez, Hallie Mitnik, Sean T. Parmenter, Ian Spiridigliozi, Dorothy Summers, Tanner Weiland, Tori Roseman, Colleen Foley, and Julia Jenkins (collectively, “Represented Defendants”).

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between each of the parties through their undersigned counsel as follows:

1. The time for the Represented Defendants to move or answer the operative Complaint is hereby extended to and including September 27, 2024.
2. The Represented Defendants hereby waive any and all jurisdictional defenses based on lack of subject matter jurisdiction and lack of personal jurisdiction including but not limited to insufficient process or insufficient service of process. Subject to the foregoing waivers by the Represented Defendants, the Represented Defendants expressly reserve all other rights, defenses, or other objections, including but not limited to failure to state a cause of action, and lack of subject matter jurisdiction.

Dated: New York, New York
August 6, 2024

LIEB AT LAW

By: /s/ Cheryl Berger
Andrew M. Lieb
Cheryl L. Berger
Kimberly A. Morgan
308 W. Main Street, Suite 100
Smithtown, NY 11787
(646) 216-8009
cheryl@liebatlaw.com
andrew@liebatlaw.com
Kimberly.Johnson@liebatlaw.com

THE LOUIS D. BRANDIES CENTER
FOR HUMAN RIGHTS UNDER LAW

By: /s/ Rory Lancman
Rory Lancman
1717 Pennsylvania Avenue, NW
Washington, D.C. 20006
(917) 363-9004
rlancman@brandiescenter.com

*Counsel for Plaintiffs Ilana Kopmar, Diane
T. Clarke, and Isaac Altman*

LEVY RATNER, P.C.

By: /s/ Allyson L. Belovin
Allyson L. Belovin
Aleksandar L. Felstiner
Jessica I. Apter
80 Eighth Avenue, Floor 8
New York, NY 10011
Telephone: (212) 627-8100
afelstiner@levyratner.com
abelovin@levyratner.com
japter@levyratner.com

*Counsel for Association of Legal Aid
Attorneys UAW Local 2325*

SO ORDERED:

Hon. J. Paul Oetken
United States District Court Judge